

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

CHRISTI ROMANO, aka  
Christi Machala

Defendant.

Cr. No.

In violation of 18 U.S.C. §§ 1343 and  
1001.

2014 OCT 15 P 12:11  
CR 14 119 M

INDICTMENT

The Grand Jury charges that:

Introduction

At all times relevant to this Indictment:

1. Chrisha Creations, LTD ("Chrisha Creations") was a Rhode Island business located in Smithfield, Rhode Island which was in the toy manufacturing business.
2. Chrisha Creations maintained a business checking account at Bank of America, N.A. The checking account number was \*\*\*\*-\*\*\*\*-8029 ("Chrisha checking account").
3. Defendant CHRISTI ROMANO, aka, Christi Machala was an employee of Chrisha Creations but at no time was she authorized to access or otherwise use the funds on deposit in the Chrisha checking account.
4. Defendant, CHRISTI ROMANO, aka, Christi Machala maintained several personal credit card accounts as follows: 1) JPMorganChase Visa card number \*\*\*\*-\*\*\*\*-\*\*\*\*-9246; 2) JPMorganChase Visa card number \*\*\*\*-\*\*\*\*-\*\*\*\*-9860; 3) JPMorganChase Visa card number \*\*\*\*-\*\*\*\*-\*\*\*\*-1119; 4) JPMorganChase Visa card

number \*\*\*\*-\*\*\*\*-\*\*\*\*-2600; 5) JPMorganChase Visa card number \*\*\*\*-\*\*\*\*-\*\*\*\*-8727; and 6) JPMorganChase Visa card number \*\*\*\*-\*\*\*\*-\*\*\*\*-5806 ( collectively, “credit card accounts”).

**The Scheme and Artifice To Defraud**

5. From in or about January 2010, and continuing until in or about March 2012, Defendant CHRISTI ROMANO, aka, Christi Machala, intended to and did devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises.

6. The object of the scheme and artifice was for Defendant, CHRISTI ROMANO, aka, Christi Machala, to pay her various personal credit card accounts using the Chrisha checking account without permission or authority.

7. Beginning in or about January 2010, Defendant, CHRISTI ROMANO, aka, Christi Machala, would contact her credit card company by telephone and or computer and cause an electronic transfer of funds to be made from the Chrisha checking account to the issuer of one of her credit card accounts.

8. As a result of this scheme and artifice to defraud, Defendant CHRISTI ROMANO, aka, Christi Machala fraudulently obtained approximately \$274,751.06 in money belonging to Chrisha Creations to which she was not authorized nor entitled to withdraw.

Counts 1-7

9. On or about the dates set forth below, within the District of Rhode Island and elsewhere, Defendant CHRISTI ROMANO, aka, Christi Machala, having devised and intending to devise, as described above in paragraphs 1-8 which are incorporated by reference, a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, transmitted and caused to be transmitted by means of wire in interstate and foreign commerce, the writings, signs, signals, pictures, and sounds listed below in each count for the purpose of executing the scheme and artifice:

<u>Count</u>	<u>Date</u>	<u>Wire Transmission</u>
1	February 16, 2010	Wire transfer in the amount of \$1,935.56 from Bank of America, N.A. checking account ****_****- 8029 to JPMorganChase for Visa account ****_****- ****-9246.
2	April 14, 2010	Wire transfer in the amount of \$1,618.30 from Bank of America, N.A. checking account ****_****- 8029 to JPMorganChase for Visa account ****_****- ****-9860.
3	July 16, 2010	Wire transfer in the amount of \$3,286.76 from Bank of America, N.A. checking account ****_****- 8029 to JPMorganChase for Visa account ****_****- ****-1119.
4	November 2, 2010	Wire transfer in the amount of \$1,432.54 from Bank of America, N.A. checking account ****_****- 8029 to JPMorganChase for Visa account ****_****- ****-2600.
5	April 21, 2011	Wire transfer in the amount of \$1,231.35 from Bank of America, N.A. checking account ****_****- 8029 to JPMorganChase for Visa account ****_****- ****-8727.
6	September 14, 2011	Wire transfer in the amount of \$1,168.87 from Bank of America, N.A. checking account ****_****- 8029 to JPMorganChase for Visa account ****_****- ****-5806.
7	March 26, 2012	Wire transfer in the amount of \$3,417.16 from Bank of America, N.A. checking account ****_****- 8029 to JPMorganChase for Visa account ****_****- ****-5806.

All in violation of 18 U.S.C. § 1343.

**Count 8**

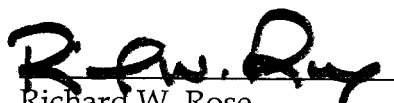
10. On or about April 25, 2013, within the District of Rhode Island, defendant CHRISTI ROMANO, aka, Christi Machala, in a matter within the jurisdiction of the Federal Bureau of Investigation, did knowingly and willfully falsify, conceal, and cover by a trick, scheme or device, a material fact, and did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation, by falsely stating that she did not take, steal, or misapply funds belonging to Chrisha Creations, LTD for her personal benefit, to wit: paying her personal credit card balances,

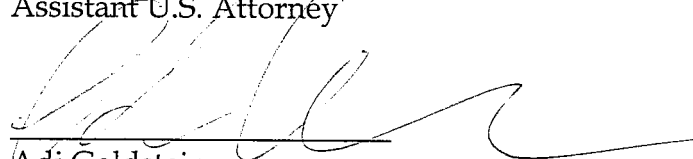
All in violation of 18 U.S.C. § 1001.

A TRUE BILL:

**REDACTED**

PETER F. NEHRONA,  
United States Attorney

  
Richard W. Rose,  
Assistant U.S. Attorney

  
Adi Goldstein,  
Assistant U.S. Attorney,  
Criminal Division Chief

DATED: October 15, 2014

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT CASE NO. \_\_\_\_\_Matter Sealed: ☐ Juvenile ☐ Other than Juvenile
☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added  
☐ Indictment ☐ Charges/Counts Added  
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND  
DISTRICT OF Divisional OfficeName and Office of Person PETER F. NERONHA  
Furnishing Information on ☒ U.S. Atty ☐ Other U.S. Agency  
THIS FORM Phone No. (401) 709-5043Name of Asst. Richard W. Rose  
U.S. Attorney  
(if assigned)

## PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)  
Internal Revenue Service☐ person is awaiting trial in another Federal or State Court  
(give name of court)☐ this person/proceeding transferred from another district  
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges  
previously dismissed which were  
dismissed on motion of:  
☐ U.S. Atty ☐ Defense☐ this prosecution relates to a  
pending case involving this same  
defendant. (Notice of Related  
Case must still be filed with the  
Clerk.)☐ prior proceedings or appearance(s)  
before U.S. Magistrate Judge  
regarding this defendant were  
recorded underSHOW  
DOCKET NO.MAG. JUDGE  
CASE NO.Place of  
offense RHODE ISLAND

County

USA vs.

Defendant: CHRISTI ROMANO, aka Christi Machala

Address:

☐ InterpBirth  
Date 12/

Social Sec

**REDACTED**Issue: ☐ Warrant ☒ Summons

Location Status:

Arrest Date \_\_\_\_\_ or Date Transferred to Federal Custody \_\_\_\_\_

☐ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ FugitiveDefense Counsel (if any): John MacDonald, Esq.☐ FPD ☐ CJA ☒ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

## OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1-8

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1-7	18 U.S.C. § 1343	Wire Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
Max	Penalty each count: 30 yrs. imprisonment;	\$1,000,000 fine; 5 yrs. S/R; & \$100 assessment.	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
8	18 U.S.C. § 1001	False Statements	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
Max	Penalty: 5 years imprisonment; \$250,000 fine;	3 yrs S/R; \$100 assessment.	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor